

SUMMONS IN A CIVIL ACTION

CIV. 1 (2-64)
(Formerly D. C. Form No. 45 Rev. (6-49))

United States District Court

FOR THE

DISTRICT OF MASSACHUSETTS

LEO J. SHEEHAN III

CIVIL ACTION FILE NO. 73-1910-G

Plaintiff

v.

UNITED STATES FEDERAL GOVERNMENT;
THE DEPARTMENT OF DEFENSE; and
THE CENTRAL INTELLIGENCE AGENCY

Defendant

SUMMONS

To the above named Defendant s :

You are hereby summoned and required to serve upon Leo J. Sheehan III Pro Se

plaintiff's attorney , whose address 20 Royal Crest Drive, North Andover, Mass.

an answer to the complaint which is herewith served upon you, within 60 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

GEORGE F. McGRATH

Clerk of Court.

Deputy Clerk.

Date: June 19, 1973

[Seal of Court]

NOTE:—This summons is issued pursuant to Rule 1 of the Federal Rules of Civil Procedure.

A TRUE COPY
ATTEST:

In the United States District Court
For the District of Massachusetts

Leo J Sheehan, III
Plaintiff
V.

FILED
U.S. DISTRICT COURT
DISTRICT OF MASS
JUL 16 1973

The United States Federal
Government, the Department
of Defense, the Central
Intelligence Agency
Defendant

73-1910-G

Complaint

The Plaintiff brings this civil
action against the ~~United States~~ Above
named Defendant to enjoin that
Agency and Department from further
pursuit of certain actions alleged
here in section entitled the plaintiff's
claim, and to recover damages settlements
of monetary value in return for the
harassment of these previous actions.

Jurisdiction And Venue

1.) At all times relevant to this complaint,
plaintiff, Leo J. Sheehan, III WAS A
citizen of the United States of
America having ^{permanent} residence at 173 High St
Reading, Middlesex, Massachusetts until

21 December 1972 and thereafter residing at 20 Royal Crest Drive, North Andover, Massachusetts. Although permanent residence was at Reading, Massachusetts, Plaintiff was outside the United States from April 1967 until November 1967 on assignment as civilian consultant working for Raytheon Company at the Aviano Air Base, Aviano, Udine, Italy, as maintained by the US Air Force under NATO ~~Force~~ Agreement. Plaintiff was born in New Albany, Indiana, USA on 15 October 1943 and is a US Citizen by birth. The Plaintiff is now employed as an Electrical Engineer working for Western Electric Company in North Andover, Massachusetts.

2) Defendant, the United States Federal Government, Department of Defense, the Central Intelligence Agency is publicly known and requires little definition in this court.

3) This Cause of Action is filed originally in this Court wherein the matter of controversy exceeds the sum of \$1,000,000, one million dollars, exclusive of costs and reasonable attorneys fees.

Plaintiff's Claim

4) From the ~~date~~ month of June 1958 inclusive to the present date of filing of this complaint, the plaintiff has been the subject of military actions in which agents of the Central Intelligence Agency have persecuted, drugged and performed illegal operations upon him. Drug warfare has been used repeatedly upon the plaintiff through unauthorized entrance to his domicile and thereafter poisoning of the food and beverages there contained as well as the impregnation of narcotics within Plaintiff's home furniture and bed mattresses and pillows. Plaintiff's personal automobile has been tampered with via narcotics and also its operation has been impaired so as to ~~the~~ limit its ability to evade plaintiff's pursuing oppressors. These actions having been taken from the time of Plaintiff's sophomore year in ~~Reading~~ ^{Reading} High School continuously to the present.

5) Plaintiff was drugged in high school to the severe detriment to his grades.

6) Plaintiff was drugged in college, Lowell Technological Institute, Lowell, Mass. to the detriment of his grades and professional advancement.

7) Plaintiff was drugged at his professional employment as a summer student at Lowell Technological Institute Research Foundation, Lowell, Mass. Massachusetts Institute of Technology Instrumentation Laboratory, Cambridge Mass, EPSCO Incorporated, Weymouth Mass, Sylmaria Electric Products East, Waltham, Mass, Raytheon Company, Inc. Quincy, Italy and Burlington, Mass, and Sanders Associates, Bedford, Mass, and at Western Electric Company, North Andover, Mass.

8) Plaintiff has been drugged outside of his places of employment at locations too numerous to mention and remember.

9) Plaintiff was forcibly submitted to a Prefrontal lobotomy and a partial testiclectomy in ~~the~~ November of 1969.

10) Plaintiff has been forcibly submitted against his will to other operations.

11) Plaintiff's salary, professional advancement, and pursuit of all personal happiness is now and has been limited and controlled by the defendant.

Wherefore, plaintiff prays that the Court:

1~~st~~) Cause the issuance of a temporary Restraining Order restraining the defendants, the United States Federal Government, Department of Defense, Central Intelligence Agency, from further actions of the nature above stipulated.

2~~nd~~) Cause the issuance of a preliminary injunction enjoining the defendants from further actions.

- 3 ~~4~~) Cause to be issued a final order enjoining the defendant from these actions.
- 4) Award to the Plaintiff its costs and reasonable attorneys fees
- 5) Award to the Plaintiff damages in the sum of \$10,000,000, ten million dollars, or such amount as the court shall deem reasonable as payment for the damages of such actions.
- 6) Such other and further relief as this court may deem appropriate.

Leo J. Sleehan, III

in action for himself the Plaintiff



120 Royal Crest Drive
North Andover, Massachusetts

18 June 1973

01845

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